

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

| | | |
|---------------------------|---|-------------------------|
| UNITED STATES OF AMERICA, |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Docket No. 5:22-CR-84-1 |
| |) | |
| EDWARD LAMSON, |) | |
| Defendant. |) | |

MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the defendant is charged with a felony offense that involves the possession of a firearm. *See* 18 U.S.C. § 3142(f)(1)(E).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of any other person and the community and the defendant's appearance as required. At the time Lamson possessed the firearm at issue in this case, he was on release pending proceedings in multiple state cases. His apparent disregard for the seriousness of his position and for the conditions of his state release, combined with his possession of a firearm, ammunition, and controlled substances, show that he poses a danger to his community as well as a risk for non-compliance if released, including non-appearance for further proceedings in this matter.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing as soon as a pretrial services investigation can be completed.

Dated at Burlington, in the District of Vermont, August 8, 2022.

Respectfully submitted,

NIKOLAS P. KEREST
United States Attorney

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